

Serial No.: 10/611,509  
Docket No.: 60655.1300

### REMARKS

Applicants reply to the Office Action mailed on June 10, 2005 within two months. Thus, Applicants request an Advisory Action, if necessary. Claims 6-15 were pending in the application and the Examiner rejects claims 6-15. Support for the amendments may be found in the originally-filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of the application is respectfully requested.

The Examiner has noted that the declaration is defective, as it does not identify the city and state of residence for inventor Melinda Pollock. Applicants enclose with this reply, an application data sheet disclosing the city and state of residence for inventor Melinda Pollock.

#### Rejection under 35 U.S.C. § 102(b)

The Examiner rejects claims 6 and 9-15 under 35 U.S.C. § 102(b) as being anticipated by Liaguno et al., U.S. Patent No 5,729,741 ("Liaguno"). Applicants respectfully traverse this rejection.

Liaguno generally discloses a system for storing various forms of media along with transcriptions. The transcriptions enable a user to search for phrases or keywords within the transcript in order to locate pertinent audio, video or document scans. Liaguno is limited to the use of optical character recognition (OCR) to create a textual version of a scanned document. Liaguno is also limited to utilizing voice recognition (VR) technology to create textual transcripts of audio and video content. The transcribed documents, audio portion and video portion are stored with their respective digitized format within a computer memory structure.

In order to appreciate the distinction between *comparison* (e.g., OCR and VR) and *conversion* (e.g., program instructions), it is important to understand that where recognition technology is used, a direct conversion from binary to text is not possible.

While several distinct technologies are known to provide OCR and VR functionality, the underlying principle among the technologies is the same. OCR software compares what the OCR scanner sees as a character with a library of character matrices or templates. If a comparison is found in the library or template, then the corresponding ASCII character is assigned to represent the scanned character. This is repeated until all characters in the scan have been compared and assigned an ASCII character. VR uses a very similar process which uses a digital "sound print" to search a library or template. In short, recognition technology does not implement a direct

AXP No. TH200314099

4

1697978.2

Serial No.: 10/611,509  
Docket No.: 60655.1300

conversion from a binary file to a text file, and in fact, by nature, such a direct conversion would not even be possible.

A conversion process between a binary file and a text file, on the other hand, occurs at the microprocessor level and requires no comparison of the bits of the binary file to any sort of library, dictionary or template. In fact, the distinction between binary files and text files is vague because any computer file, whether text or binary, is a sequence of digital bits. To the processor and software which handles information read from or written to a disk, there is no distinction between text data and any other sort of data. However, in order for the data to be readable to humans, it must first be converted to text.

The conversion process looks at the value of sets of eight bits, each set representing one text character. Each bit is valued at either 0 ("on") or 1 ("off"), and the on/off value of each of the eight bits determines which text character the set represents. For example, the word "text" represented in binary form is "01110100 01100101 01111000 01110100", wherein the first set of bits represents the "t", the second set represents the "e", and so on. Therefore, the direct conversion of this binary set to text results from a mathematical equation, which is completely different from a comparison of a bit value to a library of possible bits, as required by OCR and VR.

Liaguno constructs a textual representation of digital files based on a series of comparisons performed by computing logic which does not result in a direct conversion of binary data to text data. This is an important distinction, as those skilled in the art would immediately appreciate that OCR and VR is extremely processor intensive, requires specialized hardware and software, and is not 100% accurate. As such, Liaguno does not disclose or suggest at least "converting said binary content directly into text content," as recited by independent claim 6.

Claims 7-15 variously depend from independent claim 6, therefore dependent claims 7-15 are differentiated from the cited reference for at least the same reasons as set forth above, as well as in view of their own respective features.

#### **Rejection under 35 U.S.C. § 103(a)**

The Examiner rejects claims 7 and 8 under 35 U.S.C. § 103(a) as being unpatentable over Liaguno in view of Anderson et al., U.S. Patent No. 5,799,310 ("Anderson"). Applicants respectfully traverse this rejection.

The Examiner correctly notes that "Liaguno does not explicitly store said binary content as a binary large object (BLOB) or said text content as a character large object (CLOB) as claimed" (page 5, item 6). The Examiner asserts that Anderson discloses a system and method similar to that

Serial No.: 10/611,509  
Docket No.: 60655.1300

of Liaguno, wherein binary content is stored as a BLOB in one field of a database record, while corresponding text content is stored as a CLOB in another field of the database" (page 5-6, item 6).

Anderson discloses extenders for a relational database, wherein the extenders comprise dedicated table columns for describing and relating complex objects. Anderson generally discloses storing a BLOB in a hidden table field or providing a reference within a table field that point to a BLOB file. In addition to the Anderson disclosure, the ability to store a CLOB is an inherent property of most databases systems. However, neither Liaguno, Anderson, nor a combination thereof disclose or suggest at least "converting said binary content directly into text content," as recited by independent claim 6 from which dependent claim 7 depends.

The Examiner next rejects claims 6-16 under 35 U.S.C. § 103(a) as being unpatentable over Wason, U.S. Patent Application Publication No. 2004/0268235 ("Wason") in view of Anderson. Applicants respectfully traverse this rejection.

Wason generally discloses a method for editing rich text within a standard web browser, wherein edits may include changing the font face, size, color, underline, bold, italic, etc. Rich Text Format (RTF) is a file format that expands the utility of standard text by providing a number of properties governing the appearance of the text. Wason discloses the storage and retrieval of text within various formats (e.g., CLOB, html representation, text and plain text).

Because plain ASCII text contains no formatting information, it can be universally read and displayed by any number of computer programs. Text created and saved in the format of a proprietary application such as Microsoft Word®, for example, cannot be saved as a standard text file while preserving the specific formatting of the text. In order to provide complex instructions regarding the appearance and arrangement of text, proprietary applications must save text as a binary file. If one were to open a Microsoft Word document using a standard text editor (e.g., Notepad®), the text would be unreadable.

RTF is a hybrid of standard ASCII text which was created to maintain the simplicity and utility of the ASCII standard, while providing limited text formatting capabilities such as, for example, font type, font style, font color, etc. However, unlike files created by proprietary applications, the actual text within an RTF is preserved in human readable format. An example is provided below where the phrase, "This is human readable text" was created and saved as an RTF file using Microsoft's WordPad® application. The RTF file was then opened using Microsoft's ASCII text reader, Notepad®, resulting in the following:

```
{\rtf1\ansi\ansicpg1252\deff0\deflang1033 {\fonttbl {\f0\fswiss\fcharset0 Arial;}}
```

AXP No. TH200314099

6

1697978.2

Serial No.: 10/611,509  
Docket No.: 60655.1300

{\\*\generator Msftedit 5.41.15.1503;}\viewkind4\uc1\pard\fs20 This is human readable text.\par  
}

While it is clear that the file contains information in addition to the originally saved string, the RTF is clearly human readable and the originally entered phrase is intact. Therefore, a computerized searching utility can find a text string in an RTF.

Wason discloses saving an RTF to a database field and various representations of the RTF in another database field. This saving routine is implemented to enable the text of the RTF to be added to an HTML stream in order to be received and displayed at a web browser. A user may then use a web page interface to modify the formatting of the text and to save the modified text back to the database, where the original RTF is updated with the changes. As such, Wason does not disclose or suggest at least, "storing said binary content within a first field of said record, wherein said binary content does not contain searchable text" as recited by independent claim 6.

Claims 7-15 variously depend from independent claim 6, therefore dependent claims 7-15 are differentiated from the cited reference for at least the same reasons as set forth above, as well as in view of their own respective features.

Applicants respectfully submit that the pending claims are in condition for allowance. The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account No. 19-2814. Applicants invite the Office to telephone the undersigned if the Examiner has any questions regarding this Reply or the present application in general.

Respectfully submitted,

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By: 

Howard Sobelman  
Reg. No. 39,038

**SNELL & WILMER L.L.P.**  
400 E. Van Buren  
One Arizona Center  
Phoenix, Arizona 85004  
Phone: 602-382-6228  
Fax: 602-382-6070  
Email: [hsobelman@swlaw.com](mailto:hsobelman@swlaw.com)